

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

TINA MULLINAX, et al.,

Plaintiffs,

v.

SEVIER COUNTY, et al.

Defendants.

Case No. 3:18-cv-00002

INITIAL DISCLOSURES

Plaintiffs, Tina Mullinax, Brian Mullinax, and Robin Sutton, make the following initial disclosures:

Rule 26(a)(1)

**(I). THE NAME, ADDRESS AND TELEPHONE NUMBER OF EACH
INDIVIDUAL LIKELY TO HAVE DISCOVERABLE INFORMATION**

1. Tina Mullinax
c/o A. Philip Lomonaco, Stan Young, and Cameron Bell
800 S. Gay Street, Suite 1950
Knoxville, TN 37929
Subject: Person has information regarding Defendants used of excessive force and other constitutional violations, or the person witnessed the use of excessive force or other violations.
2. Brian Mullinax
c/o A. Philip Lomonaco, Stan Young, and Cameron Bell
800 S. Gay Street, Suite 1950
Knoxville, TN 37929



Subject: Person has information regarding Defendants used of excessive force and other constitutional violations, or the person witnessed the use of excessive force or other violations.

3. Robin Sutton

c/o A. Philip Lomonaco, Stan Young, and Cameron Bell
800 S. Gay Street, Suite 1950
Knoxville, TN 37929

Subject: Person has information regarding Defendants used of excessive force and other constitutional violations, or the person witnessed the use of excessive force or other violations.

4. Michael O'Connor, EMT IV

718 Middle Creek Rd
Sevierville, TN 37862
Phone: (865) 453-3248

Subject: Person has information regarding Defendants used of excessive force and other constitutional violations, or the person witnessed the use of excessive force or other violations.

5. Todd Spence

P.O. Box 4218
Sevierville, TN 37864
Phone: (865) 453-3248

Subject: Person has information regarding Defendants used of excessive force and other constitutional violations, or the person witnessed the use of excessive force or other violations.

6. Justin Johnson- SCSO

106 W Bruce St

Sevierville, TN 37862

Phone: (865) 453-4668

Subject: Person has information regarding Defendants used of excessive force and other constitutional violations, or the person witnessed the use of excessive force or other violations.

7. Bart Tyner- SCSO Corporal

106 W Bruce St

Sevierville, TN 37862

Phone: (865) 453-4668

Subject: Person has information regarding Defendants used of excessive force and other constitutional violations, or the person witnessed the use of excessive force or other violations.

8. Jessica Savarese- SCSO Deputy

106 W Bruce St

Sevierville, TN 37862

Phone: (865) 453-4668

Subject: Person has information regarding Defendants used of excessive force or the person witnessed the use of excessive force.

9. Michael Phipps- SCSO Deputy

106 W Bruce St

Sevierville, TN 37862

Phone: (865) 453-4668

Subject: Person has information regarding Defendants used of excessive force or the person witnessed the use of excessive force.

10. Deputy Watts- SCSO

106 W Bruce St

Sevierville, TN 37862

Phone: (865) 453-4668

Subject: Person has information regarding Defendants used of excessive force or the person witnessed the use of excessive force.

11. Johnny Bohanon- SCSO Investigator

106 W Bruce St

Sevierville, TN 37862

Phone: (865) 453-4668

Subject: Person has information regarding Defendants used of excessive force or the person witnessed the use of excessive force.

12. Wane Patterson- SCSO Sergeant

106 W Bruce St

Sevierville, TN 37862

Phone: (865) 453-4668

Subject: Person has information regarding Defendants used of excessive force or the person witnessed the use of excessive force.

(II) A COPY OR DESCRIPTION BY CATEGORY AND LOCATION OF ALL DOCUMENTS ELECTRONICALLY STORED INFORMATION AND INTANGIBLE THINGS THAT THE DISCLOSING PARTY HAS ITS POSSESSION THAT MAY BE USED TO SUPPORT ITS CLAIMS OR DEFENSES

1. Medical Records

- a. At this point, there is no medical records in Plaintiffs possession, custody, or control but medical records may become available.

(III) COMPUTATION OF DAMAGES

At this time Plaintiffs are in the process of collecting and updating all medical records.
Pain and suffering damages are in the process of being determined.

(IV) INSURANCE AGREEMENT

There is no known insurance agreement.

Rule 26(a)(2)

(A) DISCLOSURE OF EXPERT WITNESS. Plaintiffs have not yet identified any person who may testify as an expert at trial.

Respectfully submitted this 9th day of May 2018.

/s/ A. Philip Lomonaco, BPR # 011579
800 S. Gay Street, Suite 1950
Knoxville, TN 37929
phillomonaco@gmail.com
(865) 521-7422
Attorney for Plaintiffs

/s/ Cameron Bell, BPR # 027772
800 S. Gay Street, Suite 1950
Knoxville, TN 37929
(865) 521-7422
cameron@bellyoung.com
Attorney for Plaintiffs

/s/ Stan Young, BPR # 027953
800 S. Gay Street, Suite 1950
Knoxville, TN 37929
(865) 521-7422
jsy.knox.law@gmail.com
Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on May 9, 2018, a copy of the foregoing Initial Disclosures were served by electronic mail and U.S. Mail, postage prepaid, upon Rhonda Bradshaw and Federico Flores at 800 S. Gay Street, Suite 1400, Knoxville, TN 37929.

By: /s/ A. Philip Lomonaco

By: /s/ Stan Young

By: /s/ Cameron Bell